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U.S. Fish and Wildlife Service
Ventura Fish and Wildlife Office
Attn: Greg Sanders
2493 Portola Road, Suite B
Ventura, CA 93003-7726

FISH AND WILDLIFE
SERVICE

AUG 24 2000

RECEIVED
VENTURA, CA

RE: Scoping Comments: Intent to Prepare a Draft Supplement Environmental Impact Statement Pertaining to the Translocation of Southern Sea Otters.

Dear Mr. Sanders:

On behalf of the Animal Protection Institute, a national non-profit organization with 85,000 members of whom 13,000 reside in California, I am writing to offer scoping comments on the Draft Environmental Impact Statement (DEIS) pertaining to the translocation of southern sea otters.

Before proceeding with these comments, we would like to commend the Fish and Wildlife Service (FWS) for recognizing the need for a supplemental EIS and for facilitating the public scoping meeting held on August 15 at which I offered oral comments. I offer these written comments as a supplement to my oral comments and in support of the issues and alternatives that are of particular interest to API.

Issues for Study

We ask that the following issues be addressed in the DEIS:

- Effects of recreational and commercial fishing on sea otters – including harassment, competition for resources and the effects of lost fishing gear, i.e. hooks, baits, nets and lines
- The effect of “no-take zones” on coastal resources, sea otter recovery and commercial fisheries
- Effect of alternatives on the goals and mandates of the Channel Island National Marine Sanctuary
- Effect of alternatives on the goals and mandates of the Channel Islands National Park.
- Humaneness of alternatives and sea otter –fishery conflict strategies
- Public acceptance of alternatives/strategies

Alternatives to be Considered

We ask that the following alternatives be considered:

Establish no-take zones

The establishment of “no-take” zones could benefit fishermen as well as sea otters and other marine species. With a third of America’s harvested marine species threatened by overfishing, there is a growing consensus among marine scientists that the creation of “no take zones” is critical in restoring depleted fish populations

and protecting ocean habitat, yet less than 1% of the world's oceans have been designated for protection. In 1998, 1,600 scientists appealed to Congress to increase marine conservation efforts, including the establishment of a "no-take" concept for 20 percent of the world's oceans by the year 2020. Establishing a system of marine reserves along the California coast would be a step toward achieving this goal and could potentially mitigate fishery -otter conflicts.

No otter removal

Based on past capture and removal efforts, translocation involves a high risk to the otters and can not be considered a non-lethal method. The FWS has jurisdiction over the management of the southern sea otter because of their Threatened status under the Endangered Species Act and according to the Marine Mammal Protection Act. API urges FWS to take immediate action to suspend the regulatory provision for capture and removal in the interim of this review.

Encourage natural sea otter range expansion

The current status of the sea otter population and the potential risk of an oil spill and/or local catastrophes is a compelling reason to allow the otters to naturally expand their range and thereby allowing them reclaim their valuable role in the California coastal ecosystem.

Public education

Public education aimed at informing consumers about the environmental impacts of their food choices and encouraging the elimination or reduction of seafood choices that cause competition between fishermen and marine mammals.

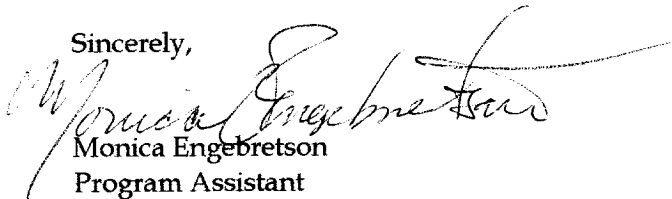
Conclusion

API urges the Fish and Wildlife Service to keep in mind what is best for the southern sea otter and not to allow pressure from unsustainable commercial industries to jeopardize their recovery.

API supports an ecosystem-based approach to the management of marine fisheries as backed by the Marine Mammal Protection Act (MMPA) and by the Magnuson-Stevens Fishery Conservation and Management Act (FCMA). As a keystone species the sea otter is essential to an ecosystem-based management plan.

Again, we thank you for this opportunity to comment on this issue that is of great importance to API, our members and to many Americans.

Sincerely,



Monica Engebretson
Program Assistant
Marine Mammals